USDA Foreign Agricultural Service
GAIN Report
Global Agricultural Information Network

Voluntary - Public

Date: 4/23/2013
GAIN Report Number: IN3042

India

Post: New Delhi

Public Comments on Draft Wine Standards

Report Categories:
Wine
Agriculture in the News
Beverages
Product Brief
Trade Policy Monitoring

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Report Highlights:
The Indian Grape Processing Board has published the comments it received in response to its proposed wine standards. The industry is reviewing the comments and is still accepting additional comments, although it is not clear for how long. The new standards will reportedly apply to imported wines and will eventually be enforced by food safety officials.

Disclaimer: This summary is based on a cursory review of the subject announcement and therefore should not be viewed under any circumstance, as a definitive reading of the regulation in question, or of its implications for U.S. agricultural export trade interests.

The Indian Grape Processing Board (IGPB) has published the comments it received in response to its proposed wine standards on its website, see IN3041 for additional background. The comments can be accessed at the following link and copies are provided in this report. An industry source indicates that concerned parties can still submit comments, but should do so as soon as possible. The initial comment period closed on April 15. The IGPB met on April 20 to review the comments and is expected to have at least one more meeting to review the draft a second time. Comments can be submitted to the following e-mail addresses admin@igpb.in or coo@igpb.in and draft standards can be viewed at the following link or in IN3041.

These are currently draft industry standards that will eventually be submitted to the Ministry of Food Processing for submission to the Food Safety and Standards Authority of India (FSSAI) where the standards will eventually be adopted as official standards governing the production of wine. The IGPB indicates that these same standards will also apply to imported wines and FSSAI will take responsibility for regulating both imported and domestically produced wines. FSSAI currently samples and tests imported wines applying existing regulations to their testing procedures. The process of adopting the current draft standard as part of FSSAI regulations is expected to take at least 16 months. While a number of steps remain before the standards are submitted to FSSAI, it seems that as the standards proceed towards adoption as an official regulation, notifying the World Trade Organization would be an appropriate step.

Copies of the comments follow:

IGPB received comments and suggestions from various stake holders on proposed wine Standards

The consolidated document mentioning the comments is attached so also it was very encouraging to receive responses from

1. **OIV**
2. **New Zealand**
3. **USA**
4. **CEV (Europeen)**
5. **Australia**

Which are also attached herewith

SUGGESSTIONS ON WINE STANDARDS
By
Various stake holders

Mr. Jagdish Holkar

Here , I would like to insist some broad lines

As the Board has its objective to promote the entire story of Wine , raisin, wines out of Indian tropical fruits , citrus wines, etc etc
So, we need to define all above as per global standards.

First step is product definitions

Second step is to go for Indian standards in the interest of product safety / food safety / consumer safety which will cover EU stds & also go globally which will support promoting export

Third step is standard practices i.e. viticultural & oenological practices , we can take the support of international code of standard practices

Fourth step is to work on national standard label

Fifth one is Appellation of origin / wine appellation , for which we need to go for regional geographical identification & then indication (GI)

No confusion , We need follow step after step

You take the support of OIV guidelines but things can be very sometime taking our parameters into account

This we need to do taking industry into confidence

The situation is now OR never , plz consider & expedite

Mr. Mario Sequeira

Regarding the proposed wine policy I have the following comments to make and I hope you will consider them while finalising the proposed standards.

1. Unfortunately non of the wineries from Goa seem to have been consulted while proposing changes to the systems. This is most unfortunate as wines have been produced in Goa even before modern wine making started in Nashik or Bangalore. It is a fact that Goan wines contribute at least to 30% of all wine sales in the country. It is therefore surprising that we have been left totally out of the decision making process.

2. We ourselves at Tonia Liquor Industries will be the 3rd or the 4th winery in India in terms of volume sales of wine. All our wine is made from grapes. I just cant understand why we or any wineries from Goa have not been consulted.

3. Unless I have not understood there is no definition of 'Rectified food alcohol'. Can you please clarify if this is potable rectified spirit?

4. Your proposal says that addition of water will not be allowed. This is a practice which is followed in many countries of east europe (even in some new EU countries) Indeed it is an accepted practice of balancing the acid portions of the grape.

Mr. Rohit Arora

I firmly believe that there is a great need for indian wine industry to propose wine standards that meet the sustainability requirements.We must propose standards parallel to that of countries where sustainability is on the top of the priority list (for example New Zealand : http://wineinf.nzwine.com/sustainability.asp#sustain_policy).

For a new wine growing country like us (INDIA), it would be much easier to adopt the sustainable practices at this early stage. Hence, I request the Indian grape processing board to set-up guidelines for sustainable wine practices.

The minimum alco v/v% is proposed as 7%(proposed on page two under the basic definition of wine , http://www.igpb.in/images/pdf/code-of-practices.pdf) but wines could have as low as 6%(i have tasted few such wine from Germany), the bar could be lowered to 6%. Although, all such low alcoholic wines would be generally a ice wine or a late harvest wines.

Mr. Yatin Patil

As also highlighted in the meeting held on 28th Jan 2013 with ref to the wine standards, we are on the verge of laying the foundation for the Indian wine industry by setting wine standards. The recommended parameters given below cannot be the only guideline within which the framework of wine standards be drawn. To illustrate hypothetically - if a beverage was to be made without using grapes, but which met all the below parameters - would it qualify as "wine" ?

The key aspects like, **grape varieties, varietal content, Alcohol % (Natural/Added), sugar addition, acidification, type of wines, etc..,** should be the guiding pillars for setting standards for **wine**. The below mentioned parameters qualify as residual levels in wine and cannot be deemed as standards, they can be used merely as safety measures.

Whist, the definition does mention the key parameters, the same is more from an academic point of view. The key aspects need to form the **core** of wine standards in order to be of any relevance.

Basis the above, suggest the key aspects be incorporated on lines of the OIV standards to suit the Indian conditions.

Abhay Kewadkar

1. In my opinion, it is important to bring in "fruit wine" in quality standards to enable the whole agenda to be national. As of today, only two states viz., Karnataka & Maharashtra, are promoting wines, being the major grape producing states. Other states are taking a view that what is the need for them to promote wines.

   The word Wine should be synonymous with grape wine, and wines made from other fruits can be treated as "fruit wines", mentioned on the label accordingly.

   This will ensure support from other states.

2. Fortified Wines should also be taken into definition as a type of wine. Internationally, only grape alcohol is allowed to be added and as we are Member of OIV now, we can keep the same standards.

   Those who wish to use spirit other than grape based, may be allowed to do so but to be specifically mentioned on the label.

3. To develop wine standards is one thing but to implement it with complete transparency and competency is more important issue.

4. Training to viticulturist and wine makers related to controlled measures

5. Co2 in wine : recheck the parameters

6. ENA OF ANY SOURCE to be permitted for fortified wines

7. To mention on labels when its non grape based

I would recommend that we collaborate with some international agency like Australian Wine Research Institute (AWRI) or UC Davis, California, in order to bring in their competency and experience ,for us to succeed. We can always fine-tune and develop our own standards given practical conditions here

Dhananjay Datar :

As regards the reference to Varietal

There is a clear policy from OIV

We must include the same in our standards under definitions

The **OIV international standard for labelling of wines** has the following provisions for the labelling of **varietal name**:

Varietal name

a) Can only be indicated if:

- the wine is produced from at least 75% of the grapes of the said varietal;
- this varietal determines the specific character of a wine;
- the name of the varietal does not lend itself to confusion with a recognised appellation of origin or a recognised geographic indication.

b) When the names of two varietals are mentioned:

- the wine must come entirely from these two varietals;
- they must be indicated by decreasing order of importance;
- the States set the minimum percentage for the quantity of the least important grape, which must not be less than 15%.

c) Exceptionally in countries where more than two varietals are usually shown in the labelling of wine, the percentage of each must figure on the label.

NB - To ensure these provisions are respected, **it is recommended that the States demand a harvest declaration showing the produced quantities of each varietal, along with the acreage planted with these varietals**.

Concerning the methods of analysis - OIV do have some isotopic methods for the detection of water, alcohol and CO2. But for the moment OIV has not adopted specific analysis methods on wine for the detection of different varietals.

The control of the varietal composition should be done at the level of production declaration.

The above is most crucial

WINE definitions

Under 1.6.3 to use consistent measure either BARS or GM / Liter for sparkilg wines

1. For India there is a need to add other products also ...

There are products like

Citrus wine. "Citrus wine" or "citrus fruit wine" is wine produced by the normal alcoholic fermentation of the juice of sound, ripe citrus fruit (including restored or unrestored pure condensed citrus must), with or without the addition, after fermentation, of pure condensed citrus must, and with or without added citrus brandy or alcohol, but without any other addition or abstraction except as may occur in cellar treatment: Provided, That a domestic product may be ameliorated or sweetened in accordance with the provisions of 26 U.S.C. 5384 and any product other than domestic may be ameliorated before, during, or after fermentation by adding, separately or in combination, dry sugar, or such an amount of sugar and water solution as will not increase the volume of the resulting product more than 35 percent, but in no event shall any product so ameliorated have an alcoholic content, derived by fermentation, of more than 13 percent by volume, or a natural acid content, if water has been added, of less than 5 parts per thousand, or a total solids content of more than 22 grams per 100 cubic centimeters.

(ii) The maximum volatile acidity, calculated as acetic acid and exclusive of sulfur dioxide, shall not be, for natural citrus wine, more than 0.14 gram, and for other citrus wine, more than 0.12 gram, per 100 milliliters (20° C.).

(iii) Any citrus wine containing no added brandy or alcohol may be further designated as "natural."

(2) "Citrus table wine" or "citrus fruit table wine" is citrus wine having an alcoholic content not in excess of 14 percent by volume. Such wine may also be designated "light citrus wine," "light citrus fruit wine," "light sweet citrus fruit wine," etc., as the case may be.

(3) "Citrus dessert wine" or "citrus fruit dessert wine" is citrus wine having an alcoholic content in excess of 14 percent but not in excess of 24 percent by volume.

(4) Citrus wine derived wholly (except for sugar, water, or added alcohol) from one kind of citrus fruit, shall be designated by the word "wine" qualified by the name of such citrus fruit, e.g., "orange wine," "grapefruit wine." Citrus wine not derived wholly from one kind of citrus fruit shall be designated as "citrus wine" or "citrus fruit wine" qualified by a truthful and adequate statement of composition appearing in direct conjunction therewith. Citrus wine rendered effervescent by carbon dioxide resulting solely from the secondary fermentation of the wine within a closed container, tank, or bottle shall be further designated as "sparkling"; and citrus wine rendered effervescent by carbon dioxide otherwise derived shall be further designated as "carbonated."

Fruit wine. "Fruit wine" is wine (other than grape wine or citrus wine) produced by the normal alcoholic fermentation of the juice of sound, ripe fruit (including restored or unrestored pure condensed fruit must), with or without the addition, after fermentation, of pure condensed fruit must, and with or without added fruit brandy or alcohol, but without other addition or abstraction except as may occur in cellar treatment: Provided, That a domestic product may be ameliorated or sweetened in accordance with the provisions of 26 U.S.C. 5384 and any product other than domestic may be ameliorated before, during, or after fermentation by adding, separately or in combination, dry sugar, or such an amount of sugar and water solution as will increase the volume of the resulting product, in the case of wines produced from loganberries, currants, or gooseberries, having a normal acidity of 20 parts or more per thousand, not more than 60 percent, and in the case of other fruit wines, not more than 35 percent, but in no event shall any product so ameliorated have an alcoholic content, derived by fermentation, of more than 13 percent by volume, or a natural acid content, if water has been added, of less than 5 parts per thousand, or a total solids content of more than 22 grams per 100 cubic centimeters.

(ii) The maximum volatile acidity, calculated as acetic acid and exclusive of sulfur dioxide, shall not be, for natural fruit wine, more than 0.14 gram, and for other fruit wine, more than 0.12 gram, per 100 milliliters (20° C.).

(iii) Any fruit wine containing no added brandy or alcohol may be further designated as "natural."

(2) "Berry wine" is fruit wine produced from berries.

(3) "Fruit table wine" or "berry table wine" is fruit or berry wine having an alcoholic content not in excess of 14 percent by volume. Such wine may also be designated "light fruit wine," or "light berry wine."

(4) "Fruit dessert wine" or "berry dessert wine" is fruit or berry wine having an alcoholic content in excess of 14 percent but not in excess of 24 percent by volume.

(5) Fruit wine derived wholly (except for sugar, water, or added alcohol) from one kind of fruit shall be designated by the word "wine" qualified by the name of such fruit, e.g., "peach wine," "blackberry wine." Fruit wine not derived wholly from one kind of fruit shall be designated as "fruit wine" or "berry wine," as the case may be, qualified by a truthful and adequate statement of composition appearing in direct conjunction therewith. Fruit wines which are derived wholly (except for sugar, water, or added alcohol) from apples or pears may be designated "cider" and "perry," respectively, and shall be so designated if lacking in vinous taste, aroma, and characteristics. Fruit wine rendered effervescent by carbon dioxide resulting solely from the secondary fermentation of the wine within a closed container, tank, or bottle shall be further designated as "sparkling"; and fruit wine rendered effervescent by carbon dioxide otherwise derived shall be further designated as "carbonated."

wine from other agricultural products. Wine of this class is wine (other than grape wine, citrus wine, or fruit wine) made by the normal alcoholic fermentation of sound fermentable agricultural products, either fresh or dried, or of the restored or unrestored pure condensed must thereof, with the addition before or during fermentation of a volume of water not greater than the minimum necessary to correct natural moisture deficiencies in such products, with or without the addition, after fermentation, of pure condensed must, and with or without added alcohol or such other spirits as will not alter the character of the product, but without other addition or abstraction except as may occur in cellar treatment: Provided, That a domestic product may be ameliorated or sweetened in accordance with part 24, of this chapter, and any product other than domestic may be ameliorated before, during, or after fermentation by adding, separately or in combination, dry sugar or such an amount of sugar and water solution as will not increase the volume of the resulting product more than 35 percent, but in no event shall any product so ameliorated have an alcoholic content, derived by fermentation of more than 13 percent by volume, or a natural acid content, if water has been added, of less than 5 parts per thousand, or a total solids content of more than 22 grams per 100 cubic centimeters.

(ii) The maximum volatile acidity, calculated as acetic acid and exclusive of sulfur dioxide, shall not be, for natural wine of this class, more than 0.14 gram, and for other wine of this class, more than 0.12 gram, per 100 milliliters (20° C.).

(iii) Wine of this class containing no added alcohol or other spirits may be further designated as "natural".

(2) "Table wine" of this class is wine having an alcoholic content not in excess of 14 percent by volume. Such wine may also be designated as "light".

(3) "Dessert wine" of this class is wine having an alcoholic content in excess of 14 percent but not in excess of 24 percent by volume.

(4) "Raisin wine" is wine of this class made from dried grapes.

(5) "Sake" is wine of this class produced from rice in accordance with the commonly accepted method of manufacture of such product.

(6) Wine of this class derived wholly (except for sugar, water, or added alcohol) from one kind of agricultural product shall except in the case of "sake," be designated by the word "wine" qualified by the name of such agricultural product, e.g., "honey wine," "raisin wine," "dried blackberry wine." Wine of this class not derived wholly from one kind of agricultural product shall be designated as "wine" qualified by a truthful and adequate statement of composition appearing in direct conjunction therewith. Wine of this class rendered effervescent by carbon dioxide resulting solely from the secondary fermentation of wine within a closed container, tank, or bottle shall be further designated as "sparkling"; and wine of this class rendered effervescent by carbon dioxide otherwise derived shall be further designated as "carbonated."

aperitif wine. "Aperitif wine" is wine having an alcoholic content of not less than 15 percent by volume, compounded from grape wine containing added brandy or alcohol, flavored with herbs and other natural aromatic flavoring materials, with or without the addition of caramel for coloring purposes, and possessing the taste, aroma, and characteristics generally attributed to aperitif wine and shall be so designated unless designated as "vermouth" under paragraph (b) of this section.

"Vermouth" is a type of aperitif wine compounded from grape wine, having the taste, aroma, and characteristics generally attributed to vermouth, and shall be so designated.

(h) Class 8; imitation and substandard or other than standard wine. (1) "Imitation wine" shall bear as a part of its designation the word "imitation," and shall include:

(i) Any wine containing synthetic materials.

(ii) Any wine made from a mixture of water with residue remaining after thorough pressing of grapes, fruit, or other agricultural products.

(iii) Any class or type of wine the taste, aroma, color, or other characteristics of which have been acquired in whole or in part, by treatment with methods or materials of any kind (except as permitted in § 4.22(c)(6)), if the taste, aroma, color, or other characteristics of normal wines of such class or type are acquired without such treatment.

(iv) Any wine made from must concentrated at any time to more than 80° (Balling).

"Substandard wine" or "other than standard wine" shall bear as a part of its designation the word "substandard," and shall include:

(i) Any wine having a volatile acidity in excess of the maximum prescribed therefor in §§ 4.20 to 4.25.

(ii) Any wine for which no maximum volatile acidity is prescribed in §§ 4.20 to 4.25, inclusive, having a volatile acidity, calculated as acetic acid and exclusive of sulfur dioxide, in excess of 0.14 gram per 100 milliliters (20° C.).

(iii) Any wine for which a standard of identity is prescribed in this §§ 4.20 to 4.25, inclusive, which, through disease, decomposition, or otherwise, fails to have the composition, color, and clean vinous taste and aroma of normal wines conforming to such standard.

(iv) Any "grape wine" "citrus wine," "fruit wine," or "wine from other agricultural products" to which has been added sugar and water solution in an amount which is in excess of the limitations prescribed in the standards of identity for these products, unless, in the case of "citrus wine," "fruit wine" and "wine from other agricultural products" the normal acidity of the material from which such wine is produced is 20 parts or more per thousand and the volume of the resulting product has not been increased more than 60 percent by such addition.

(i) Class 9, retsina wine. "Retsina wine" is grape table wine fermented or flavored with resin.

WHAT ABOUT DEFINITIONS FOR ... PRODUCT DERIVED FROM GRAPES
THERE are oiv DEFINITIONS AVAILABLE as below

PRODUCTS DERIVED FROM GRAPES, GRAPE MUST OR WINE

Wines for distillation

Liqueur wines are dry wines fortified exclusively with wine spirit, having a minimum alcohol content of 18% vol. and a maximum of 24% vol., not included in the preceding categories and destined exclusively for distillation.

Grape sugar

Grape sugar is the syrupy, milky white or slightly yellowish product, of neutral flavour, obtained exclusively from grape must and that corresponds to the analytical prescriptions of the International Oenological Codex .

Grape juice
Grape must which has undergone authorised practices and treatments, ready to be used, unfermented, in the diet, to the exclusion of all oenological usage.

Concentrated grape juice
Product neither fermented nor caramelised, obtained by partial dehydration of grape must or juice, which has undergone authorised practices and treatments, such that its density at 20°C is not less than 1.24 g/ml.

Lightly sparkling grape drink
Drink derived from the grape or grape must, containing carbon dioxide as a result of its partial fermentation, which may have undergone solely physical practices and treatments authorised by the present Code, and destined to be used in the diet, to the exclusion of all oenological use.

The alcohol of the finished product shall be of exclusively endogenous origin and the alcohol content shall not exceed 3% vol.

Beverages based on vitivinicultural products

A beverage based on vitivinicultural products is a beverage :

- obtained from at least 50% by volume of wine, and/or special wine and/or must as defined in the International Code of Oenological Practices of the OIV,

- which could have undergone the following treatments :

- sweetening
- colouring
- addition of aromatising substances or preparations
- addition of food-related products or non alcoholic products or beverages including water
- addition of food-related products, such as must or non alcoholic products or beverages including water.

- for which the actual alcoholic strength by volume is equal to or above 3.5% vol. and below 14.5% vol.

- and for which the alcoholic component derives exclusively from the wine or special wine used, except for doses used only to dilute aromatic substances, or colorants, or any other authorised substance.

Wine based beverages

A wine-based beverage is a beverage :

- obtained from at least 50% by volume of wine, and/or special wine as defined in the International Code of Oenological Practices of the OIV,

- which could have undergone the following treatments :

- sweetening
- colouring
- addition of aromatising substances or preparations

- addition of food-related products, such as must or non alcoholic products or beverages including water

- for which the actual alcoholic strength by volume is equal to or above 3.5% vol. and below 14.5% vol.

- and for which the alcoholic component derives exclusively from the wine or special wine used, except for doses used only to dilute aromatic substances, or colorants, or any other authorised substance.

Spirits, alcohols and spirit beverages of vitivinicultural origin

Distillate of vitivinicultural origin

Alcoholic liquid is obtained :

- by direct distillation of wine, fortified wine, wine lees, or

- after alcoholic fermentation of grape marcs, raisins or fresh grapes by the distillation of these fermented musts, or

- by re-distillation of the distillate of vitivinicultural origin or wine spirits,

The distillate of vitivinicultural origin, contrary to neutral alcohol of vitivinicultural origin, must have the aroma and taste of the above-mentioned raw materials.

Wine distillate

Alcoholic liquid produced :

- by direct distillation of wine and possibly wine distillate added or,

- by re-distillation of a wine distillate.

The wine distillate, contrary to neutral alcohol of vitivinicultural origin, must have the aroma and taste from the above-mentioned raw materials.

Neutral alcohol of agricultural origin

Ethyl alcohol obtained by distillation and rectification, with a minimum alcoholic strength of 96% volume, either after alcoholic fermentation, agricultural products such as beets, molasses, potatoes, grains, grape musts, grapes or other fruits, or agricultural origin spirits including wine and which do not have a detectable taste.

A member state can however accept a minimum alcoholic strength of 95% vol. for its domestic market if this corresponds to a national law foregoing the approval of this Resolution.

Neutral alcohol of vitivinicultural origin

Ethyl alcohol obtained by distillation and rectification, with a minimum alcoholic strength of 96% volume, either after alcoholic fermentation, products of viticultural origin such as grape must, grapes or raisins, grape marcs of wine, wine with the addition of wine distillate, wine lees which present no detectable taste.

A member state can however accept a minimum alcoholic strength of 95% vol. for its domestic market if this corresponds to a national law foregoing the approval of this Resolution.

Wine spirits

A spirit beverage obtained exclusively by the distillation of wine, fortified wine, wine possibly with the addition of wine distillate or by re-distillation of a wine distillate with the result that the product retains the taste and aroma of the above-mentioned raw materials.

Alcoholic strength of the end product must not be less than 37.5% volume.

A member state can however accept a minimum alcoholic strength of 36% vol. for its domestic market if this corresponds to a national law foregoing the approval of this Resolution.

Brandy/Weinbrand

A spirit beverage obtained exclusively by the distillation of wine, fortified wine, wine possibly with the addition of wine distillate or by re-distillation of a wine distillate with the result that the product retains the taste and aroma of the above-mentioned raw materials. A certain period of aging in oak wood containers is obligatory before marketing.

Alcoholic strength of the end product must not be less than 36% volume.

Grape marc spirits

A spirit beverage obtained by the distillation of fermented grape marcs to which lees can be added whenever provided by the legislation of the State and in due proportion to the level authorised by the State with the result that the product retains a preponderant taste and aroma of the marc..

Alcoholic strength of the end product must not be less than 37.5% volume.

A member state can however accept a minimum alcoholic strength of 36% vol. for its domestic market if this corresponds to a national law foregoing the approval of this Resolution.

Wine lees spirits

A spirit beverage obtained by the distillation of fresh wine lees with the result that the product retains the taste and aroma of the above-mentioned raw materials..

The minimum alcoholic strength of the end product must not be less than 38% volume.

A member state can however accept a minimum alcoholic strength of 36% vol. for its domestic market if this corresponds to a national law foregoing the approval of this resolution.

Grape spirits

A spirit beverage obtained by the distillation of fresh fermented grapes with the result that the distillate retains the taste and aroma of the above-mentioned raw materials.

Alcoholic strength of the end product must not be less than 37.5% volume.

Raisin spirits

A spirit beverage obtained by the distillation of fermented raisin extracts with the result that the distillate retains the taste and aroma of the above-mentioned raw materials.

Alcoholic strength of the end product must not be less than 37.5% volume.

A member state can however accept a minimum alcoholic strength of 36% vol. for its domestic market if this corresponds to a national law foregoing the approval of this resolution.

Dr. S V patil

Dear Mr. Datar,
This has reference to your previous email regarding above cited subject.
I have following comments to offer in this context.
Table wine is a product obtained from alcoholic fermentation of fresh grape juice/must, possessing distinctive aroma and taste characteristic of grapes used. The Indian standards were originally issued in 1973 and subsequently revised in 2005. The specifications for table wines are listed in BIS 7058:2005. This standard includes the test methods for various parameters for evaluating quality of wines. Please find attached herewith BIS 7085:2005 for your kind reference.
Comparing BIS standards and standards recommended by OIV or NRCG we have come to the conclusion that, 22 parameters as given in the attachment are important

for quality assurance of Indian wines for domestic as well as export market. We wish to include two additional parameters (Dissolved CO2 & glycerol) which are important from the view point of wine maker as well as for quality assurance.
The BIS standard guidelines may be followed for the domestic market, but for the export market revised standards as described in the table may be considered. It has to be also checked whether the concerned winery units can afford to regularly analyse/asses the parameters mentioned.
It is also known that some wineries produce wines taking into consideration the requirements of the country where wines are supposed to be exported. Under such requirements, necessary care is usually taken in terms of use of pesticides and other sprays before the harvesting of grapes.
This issue will require serious deliberations in presence of all the stake holders.

Dr. Ajoy Shah , Dr Rasal , York , Vintage and zampa

Document: Code of practices for Wine Grapes and Wine:

1.6.1 Basic definition: Wine is the beverage resulting exclusively from the partial or complete alcoholic fermentation of fresh grapes, whether crushed or not, or of grape must. Its actual alcohol content shall not be less than 8.5% vol.

World over low alcohol wines are making huge inroads and we should keep minimum levels of about 5%. Please refer links to news of low alcohol wines sales going up really fast. These are also considered healthier options due to lower alcohol levels. We should not cut ourselves from producing lower alcohol wines.

Link 1: http://www.telegraph.co.uk/news/uknews/9556502/Sales-of-low-alcohol-wine-soar.html

Link 2: http://www.thedrinksbusiness.com/2013/02/gallo-launches-low-alcohol-white-and-pink-moscato-in-uk/

1.6.2 Complementary definitions relating to sugar content:

The wine is said to be:

Dry, when the wine contains a maximum of either 4 g/l sugar or 9 g/l when the level of total acidity (expressed in grams of tartaric acid per litre) is no more than 2 g/l less than the sugar content.

"Very confusing and can just be simplified into 3 ranges":

Dry wines: 0 to 5g/L

Medium dry: 5 to 18 g/L

Semi-sweet: 18 g/L to 45 g/L

Sweet: > 45 g/L

The table is giving a completely wrong interpretation of the OIV statement. This is because the statement is very confusing. It means that if you have 11g/L of residual sugar you can still call it dry if you have > 9 g/L of acidity (2 g/L less from sugar level)

1.6.3 Complementary definitions relating to carbon dioxide content:

The wine is said to be:

Still, when the carbon dioxide concentration is less than 4 g/l at 20°C,
Semi-sparkling, when this concentration is equal to or above 3 g/l and less than or equal to 5 g/l at 20°C.

If the carbon dioxide content of the product enables the indication of these two references, the wine maker or the importer shall only use one reference of his/her choosing.

Here also we can avoid confusion and have only 2 simple ranges:

Still wines: 0 to 3 g/L

Semi sparkling: 3g/L to 5g/L

1.1 List of wine grape varieties grown in India and used for wine making

This is only a list of some of the grapes currently grown in India but there are many other varieties used in rest of the world, need to be introduced & evaluated in india so we should not limit ourselves with the present varieties

list only, rather an ideal statement would be to include wine made from all *Vitis vinifera* grapes.

~~3.1~~ All additives and processing aids for use in the production of wine, sparkling wine, and fortified wine or wine products should be used according to ~~OIV~~ IGPB guidelines ~~(International Code of Oenological Practices and International Oenological Codex)~~

1.7 Special wines:

1.7.1, 1.7.2 and 1.7.3:

All various types of fortified wines mentioned here have to use rectified food alcohol which should (and not recommended) exclusively be of viticultural origin

Document: proposed Wine standards:

19. Sodium in excess: 100 mg/L

It is very well known that water in India is quite hard and treatments in vineyards like softening increases sodium levels which can affect levels in wines depending on rootstocks, soils and other climatic conditions. Unless we analyze the various conditions we should not put levels of 100 mg/L. We should put it as NA for the time being and in the second revision come up with a maximum limit value.

23. Volatile acidity 1 g/l (expressed as acetic acid)

OIV guidelines and USA put this at 1.2 g/L and we should keep this at 1.2 g/L if not higher. The best thing would be to keep it initially at 1.5 g/L which is still lower than NA of Australia and South Africa; we can reduce the levels if required in the second revision.

2.6 Standards of grape varieties

Growing Quality Grapes to Winery Specifications explains and defines six key quality parameters (sugar, pH, berry size, Titratable acidity, colour and contaminants such as fungal disease) as well as detailing the latest sampling procedures, the influence

of the local environment and management options that growers can use to manipulate these wine grape quality parameters.

Is a limited list, there can be several factors including fertiliser, pesticide, insecticide and chemicals usage, etc. Need to have a consensus amongst wineries

2.7 Wine grape harvesting based on TSS and pH

For example, a wine with 22°Bx and .75 TA will have almost a 30:1 Brix:TA ratio. According to the Davis researchers, the most balanced table wines tend to have a Brix to TA ratio between 30:1 - 35:1. Another method is to multiply the pH reading by itself and then multiply that number by the Brix reading. Using this method, when white wine grapes gets close to 200 and red wine grapes close to 260, it can be a good rule of thumb of when to harvest. For example white wine grapes have a pH of 3.3 and Brix of 20, after going through that formula they will have a finally number of 217.80 which is well within an acceptable harvest range for some winemakers.

This is an old system of measurement and possible guideline. Each winery has their own procedures and standards. Difficult to have a uniform system

3. Vinification:

These are all general guidelines and is difficult to define and implement. A simple system would be to ask for following specific norms like ISO certifications to have things in check and records to be maintained.

3.1 The winemaking should be carried out in the buildings maintained in an orderly, hygienic, and neat and tidy condition.

3.2 A record of the quantities and variety of wine grape, must or grape juice received in the winery should be maintained.

Various records are already maintained as per local state norms and there should not be additional burden of filling newer records

3.3 Pressing records should be kept so that all batches of product can be identified and amounts of raw materials used identified.

Various records are already maintained as per local state norms and there should not be additional burden of filling newer records

3.4 Whenever blending of different grape varieties or grapes from different growing locations is carried out, necessary record of the blending process should be maintained by the winery.

Various records are already maintained as per local state norms and there should not be additional burden of filling newer records

3.5 All additives and processing aids for use in the production of wine, sparkling wine, and fortified wine or wine products should be used according

to OIV guidelines (International Code of Oenological Practices and International Oenological Codex)

3.6 Only food grade additives and ingredients should be purchased and used in winemaking.

These are all general guidelines. A simple system would be to ask for following specific norms like ISO certifications to have things in check and records to be maintained.

3.7 A record of quantities added of additives during production of wine should be maintained.

These are all general guidelines. A simple system would be to ask for following specific norms like ISO certifications to have things in check and records to be maintained.

3.8 Where preservatives such as sulfur dioxide, sorbic acid and sorbates are added prior to bottling, the concentration should be determined and verified to ensure legal conformance.

These are all general guidelines. A simple system would be to ask for following specific norms like ISO certifications to have things in check and records to be maintained.

3.9 Sampling and analysis of wines or grape must should be carried out during the process of vinification whenever necessary. The results of the analysis should be recorded.

These are all general guidelines. A simple system would be to ask for following specific norms like ISO certifications to have things in check and records to be maintained.

All the records should be made available to the inspection agency e.g. IGPB whenever required.

3.10 Wherever the specific varietal mention is there on the lable, there should be 75% of the variety as minimum percent. Other than wine grape varieties are not allowed to make wine.

A separate discussion needs to happen on varietal labelling. Also all Vitis vinifera grapes should be allowed in winemaking considering the lack of availability of enough wine grapes

3.11 The addition of water and sugar from external source during winemaking process is not allowed. However sugar from viticultural origin can be added for making of fortified wines.

A separate discussion needs to happen on this considering smaller wineries. Water and Sugar should be allowed (as in California/ South Africa and Europe

respectively) to be used for chaptalisation only in special cases like production of fortified wines

April 12, 2013

JBC INTERNATIONAL

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Phone 202.463.8493

jclawson@moinc.com

April 12, 2013

US By E-mail

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Shivaji Nagar,
Pune 411005, Maharashtra, India
admin@igpb.in
coo@igpb.in

From: **James B. Clawson, JBC International**

Subject: Proposed National Wine Standards

JBC International submits these comments on behalf of the United States (U.S.) wine industry, ("U.S. industry") comprising Wine Institute, the California Association of Wine Grape Growers (CAWG), and WineAmerica. Wine Institute, the public policy advocacy association of California wineries, brings together the resources of over 1,000 wineries and affiliated businesses to support legislative and regulatory advocacy, international market development, media relations, scientific research, and education programs that benefit the entire California wine industry. California represents more than 90 percent of U.S. wine production and 95 percent of wine exports. CAWG is an advocate for farmers, providing leadership on public policies, research and education programs, sustainable farming practices and trade policy to enhance the California winegrape growing business and our communities. WineAmerica, the National Association of American Wineries, has more than 800 winery members in 48 states supporting initiatives to expand opportunities for US wine producers to export their product worldwide. The wine industry is grateful for the opportunity to provide comments on this proposal.

Comments

GENERAL

We commend the Indian Grape Processing Board (IGPB) for providing stakeholders with an opportunity to comment on the proposed National Wine Standards. We can welcome the development of the code of practice and standards as helping to provide clarification that would otherwise be absent. Can we assume that since the IGPB is part of the Ministry of Food Processing Industries, Government of India that it is intended that these standards will ultimately become regulations? The documents released on the website seem to form part of a larger body of work but it is not clear to the U.S. industry what that work might be or what the final status of these texts is intended to be. Some clarification of the anticipated evolution of these texts would be helpful.

As the work on these standards develops, the U.S. industry recommends that consideration be given to the World Wine Trade Group's *Regulatory Principles* as a reflection of international best practices. These Principles are:

1. Avoid the establishment of limits that stimulate unnecessary and costly analyses. (e.g., Zero salmonella in 25 ml wine even though wine will not support growth of salmonella; Pesticide MRLs for wine in addition to MRLs for grapes.)
2. Harmonize or mutually recognize limits where there is no scientific justification for national or regional differences.
3. Give due regard to intergovernmental agreements and work done by other competent authorities when establishing new regulatory limits.
4. Adopt a common system of scientific units for expressing regulatory limits.
5. Express regulatory limits on a "per unit volume of wine" basis, rather than "per unit volume of alcohol" in the wine or any other basis.
6. Adopt a common way of expressing results where this is done in relation to a single wine constituent (e.g. for Total Acidity expressed in terms of one specific acid).
7. Consider the establishment of analytical "de minimis" values (or "action values") for substances or classes of substances in wine – i.e. values below which they will be deemed, to all intents and purposes, not to be present in the wine or not to require enforcement activity.
8. Allow suitable transition arrangements when limits are tightened, provided public health considerations so permit.
9. Conduct analyses of wine for compliance purposes in suitably accredited laboratories (or ensure they are overseen by appropriately certified analysts) that perform acceptably for the specific test methods used.
10. Use analytical methods for wine compliance purposes that are validated and/or have a demonstrably appropriate level of performance for wine.
11. Ensure that analyses for wine authenticity are conducted using methods for which the database of authentic sample results (with which test samples will be compared) is sufficiently comprehensive to avoid the mis-categorization of legitimate samples as fraudulent.
12. Ensure that Laboratories testing for compliance purposes supply measurement uncertainty information with their analytical results, and agree to take this information into account in interpreting analytical data.

SPECIFIC

Code of Practice Document

1) The note at the bottom of page 12 specifies that it is the 2012 version of the OIV International Code of Oenological Practices that should be used as the reference. In practice, this text is updated by OIV annually, and the 2013 version is already available. Referring to a specific, dated version of the Code will mean that the document is rapidly outdated in relation to the developments in the winemaking world and specifically at OIV. Likewise, the definitions at the beginning of the document simply quote from the 2012 OIV

Code verbatim, but if the OIV updates its definitions, the text will become outdated. The U.S. industry suggests that IGPB adopt the relevant sections of the OIV Code by reference, and/or to indicate those sections that it is not intended to adopt.

2) Section 2, the *Check list to be followed in case of quality of wine grapes, wine grape growers, drawing grape samples, wine grape varieties grown and standards to be followed for harvesting, etc.* is directed to Indian grape growers and should not apply to imports in any future regulatory standards. The country of import often has its own guidelines and/or standards for the quality of the grapes and wine.

3) Section 3, *vinification,* again should not apply in total to imported wine in any future regulatory requirement. The OIV International Code of Oenological Practices is not, and is not intended to be, a positive list of acceptable winemaking practices. Several practices it contains are listed as "not accepted" by OIV, and some common practices (e.g. enrichment and sweetening) are not addressed in the OIV Code. Thus if a practice is not mentioned in the OIV Code it simply means that the OIV has not considered it and reached a consensus on its acceptability – it does not mean that the practice is unacceptable. This section of the proposed Indian Standard seems to limit permitted practices only to those contained in the OIV Code.

   The list of winemaking practices in the proposed Code of Practice is not a complete list of those additives and processing aids used internationally in winemaking. Attached is a current list of those additives and processing aids used widely in other wine producing countries. As the IGPB work continues to develop standards, the U.S. industry requests that these other additives and processing aids be included. If this section as constituted is established as regulatory requirements it will prevent acceptable treatments that are used all over the winemaking world from being applied in India. Sections 3.10 and 3.11 are consistent with other international standards and are supported as standards by the U.S. industry.

Proposed Wine Standards Document

- There is no legend associated with the list. We assume that "NA" in this text means there is no limit applied, i.e. "Not Applicable" rather than "Not Allowed". However, some clarification will be appreciated.

- For the limit on sodium in excess, see below for argumentation as to why this limit is not relevant for today's winemakers.

Wine Standards Justification Document

1) The U.S. industry notes that the limit for "sodium in excess" is justified on the basis of the salinity of the soils in India. It is important to note, though, that this limit was not established by the OIV to regulate the level of sodium in wine. Rather, "sodium in excess" refers to the quantity of sodium cations in the wine that cannot be paired off, one-for-one, with chloride anions (thus, saline soils shouldn't have an impact on the quantity of "sodium in excess"). This limit was originally designed to prevent the addition to wine of substances such as sodium hydroxide in order to adjust the pH upwards. The limit is not much used in the present day and age, but this background may suggest (if India still wants to adopt the limit) that there is little need to deviate from the value in the OIV text.

2) The document establishes a limit for "methanol" in sparkling wine, different than the limits for red or white wines, and without explanation in the footnote text. This does not seem to derive from an OIV value. Is there a justification?

3) The limit for "volatile acidity" limit of 1 g/L is lower compared with limits set in other parts of the world. For example, in the U.S., the limit for each type of wine is: Red: 1.40 g/L and White: 1.20 g/L (expressed as acetic acid), whereas a limit of 1.5 g/L is not uncommon in other wine producing countries. The limit in the proposed standard is one of the lowest that exists anywhere in the world and this may lead to difficulties in production but also in trade if this becomes a regulation and is applied to imported wines.

Conclusion

The U.S. industry applauds this initiative and is prepared to continue to work with the IGPB as it further develops these standards. As the Indian winegrape growing and wine production continues to increase Indian wine will gain in international prominence. The U.S. industry welcomes these developments and encourages the Indian industry and the IGBP on its behalf to adopt international best practices for producing their wine.

Thank you for the opportunity to submit these comments.

Mr.DAVID ROWE :

1. The section 2.7 "Wine grape harvesting based on TSS and pH" is not relevant to the proposed national wine standards. I believe it would be unnecessary and unhelpful to include this as part of the "official"
viticultural policy.

2. The issue of using table grapes (and interspecific crosses, or hybrid grapes) will have to be faced by the industry at some stage.
Are they to be permitted at all, and if so for domestic sales only or also for export? I believe that the industry cannot and should not bury its head in the sand and ignore the use of grapes such as Thompson Seedless and Bangalore Purple for winemaking. I am not saying that it is a bad thing to use these grapes (table grapes are used to make wine in other countries, like Australia and the United States).
But it should be made clear in the regulations if it is permitted or not, what proportion is permitted, and how the resulting wines should be labelled.

3. The use of the name "Port" also needs to be looked at. Most "Indian Port" is in fact sweetened red wine. "Real Port" comes from Portugal and it made by adding grape spirit to the fermenting must. The Portuguese authorities have indicated that they will take legal action against Indian producers of "port". The sweet red wine sold as Indian Port is highly popular on the domestic market, but my own view is that the Indian wine industry should collectively come up with a different, unique name for this category, and that this definition should also be included in the national wine standards.

These views are my personal observations based only on my very short
(6 year) experience of the Indian wine industry and do not represent the policy or opinions of any Indian wine producer.

ALOK CHANDRA

- Item 1.6.1 Basic definition of wine

Alcohol content lower limit 7.07 v/v contradicts point 1.7.6 (4.5 v/v) and 1.7.7 (5.5 v/v)
Recommend to maintain 4.0 % v/v

Item 1.6.3 CO2 content ...verify the same
In still wine its higher than the sparkling

Clause 3..11 to be deleted ... should have no restriction in using sugar of Agriculture origin
Item 2.5 To include wines from garpe other than vitis vinifera .. allow Indian varities

Sri. K. Dattachaitanya,
Sr. Scientist.

A. Tests proposed in annexure-II are health hazard related. annexure-II to be upgraded to include Glycols (EG/DEF), esters, higher alcohol, aldehydes, more importantly microbiological parameters like mould and bacteria.

B. Annexure-II shall also include Quality parameters like ethyl alcohol content, CO2, sugar, tartaric acid content, PH, CO2 ....

C. Frequency of testing also to be clarified like

   a) All batches produced or selective.

   b) How many tests ?

C.H.U. Rao,

FOR ADMINISTRING

Like ISI we can also introduce some certification. The winery has to obtain the certification and include in the label.

Rajesh Jadhav :

1. The outcome of Indian Wine Standards should achieve following basic objective:

In order to bring prosperity to the Indian Grape Growers in rural Maharashtra, Government of Maharashtra brought a Wine Policy in 2001 and on similar lines Govt. Of Karnataka also announce its wine policy in 2007 for the benefit of grape growers, so that value addition can be done to a highly perishable crop like grape and the Indian Grape Growers will get remunerative price for their produce and employment opportunity is generated in rural areas. Thus wine can be promoted as health drink in the society and to reduce the consumption of hard liquor.

In the presence draft of standards there is no protection for Indian Grape Growers.

It should be highlighted in the Indian Wine Standard that whatever are the standards the Grapes or raw material shall be used "produced in India" only. There should not

be allowed to use Imported grape juice, must, Grape juice concentrate etc. for making India Wine. That should be strictly restricted.

2. The proposed Indian Wine Standards should cover all other grape base bi-products.

3. Indian Wine Standards should be easy to understand, implement, and suitable for Indian conditions and present good practices.

OIV
International Organisation of Vine and Wine

The Director General

Paris, 8 April 2013

To:
Indian Grape Processing Board
Office No. 105 & 106,
1st floor, C.T.S. No. 802,
Kubera Chambers, Shivaji Nagar,
Pune 411005,
Maharashtra,
INDIA

Email : admin@igpb.in; coo@igpb.in

Subject: OIV comments and suggestions on the "National Wine Standards"

Dear Sirs,

It was a great pleasure for us to learn that IGPB plans to introduce new National Wine Standards, based on the standards and definitions elaborated by the OIV.

We would like to draw your attention to some details we have noticed in the proposed texts:

General Comments

- The footnote on the page 12 of the document « Code of Practices for wine grapes and wine » should rather refer only to the OIV International Code of oenological Practices and to OIV International Oenological Codex without mentioning the year of the Issue, as these documents are updated every year, introducing new resolutions adopted by the OIV General Assembly.

Specific Comments

- The Code of Practices is based on the International Code of Oenological practices (edition 2012) of the OIV. Some corrections have been recently introduced to the last edition of the Code due to a misinterpretation of one of the resolutions adopted in 2007. The most important modification concerns the category of "special wines". In the last version of the Code, there is now only one definition of "liqueur wine", the sub-definitions of "spirituous wine" and "syrupy wines" have been withdrawn.

  We would kindly advise you to replace the definitions "1.7.3 SYRUPY WINES" and "1.7.2 LIQUEUR WINE" by the definition of "LIQUEUR WINE" which covers both products.

  The definition of "LIQUEUR WINE", as defined by the latest version of the International Code of Oenological practices, is as follows:

> **Liqueur wine** is a product with acquired alcoholic strength above or equal to 15% and below or equal to 22%. A state can however, for its domestic market, apply a maximum acquired alcoholic strength of above 22% whilst remaining below or equal to 24%.
>
> Liqueur wine is made from grape musts (including partially fermented grape musts) and/or wine, to which are added, alone or in a mixture, distillates, spirits and alcohol of vitivinicultural origin.
>
> One or more of the following products can be added: concentrated or caramelised grape must, over ripened or raisined grapes, mistelles, caramel.
>
> A State can, however, for its domestic market, allow the use of neutral alcohol of agricultural origin if this usage is already authorised in the regulations of this state at the time of the adoption of the present resolution, within a limited time period.

The last updated version if the International Code of Oenological Practices is attached to this message

OIV
International Organisation of Vine and Wine

- In the point 3.11 of the Code of Practices it is mentioned that "The addition of water and sugar from external source during winemaking process is not allowed. However sugar from viticultural origin can be added for making of fortified wines".

  We understand that sugar from external source is not allowed but it could be envisaged in certain circumstances to add sugar from viticultural origin that is grape must or rectified grape must for making still wines. In fact the addition of grape must or rectified grape must during the fermentation is technologically justified when the level of sugar in grapes is not sufficient for conducting an appropriate fermentation and to reach the desired alcoholic strength of the wine.

  We underline to your attention that, the OIV does not have a position on the addition of non viticultural sugar, grape must or rectified grape must during the elaboration of still wines.

- The document "Proposed Standards and justification for Indian wines" stipulates in the point 10 "Ochratoxine A (OTA)" that "EU has set limit at 2 µg/L. The OIV had set limit of OTA in 2011 however this has been removed in 2012. The FSSAI has set limit of OTA at 20 µg/L for wheat, barley and ray."

  We would like to draw your attention to the fact that the OIV limit has not been removed and that the limit of 2 µg/L adopted by the OIV General Assembly in 2011 is still valid.

I remain at your disposal for any further request of additional information or clarification you might deem appropriate.

Please be assured of my highest consideration.

Yours very truly

Federico CASTELLUCCI

Attachments: International Code of Oenological Practices

ceev

WINEinMODERATION.eu
Art de Vivre

Wine, a taste for moderation.

Brussels, April 15th 2013

By Email:
coo@igpb.in.3
admin@igpb.in

CEEV comments on the draft Code of Practices for wine grapes and wine

CEEV (*Comité Européen des Entreprises Vins / European Committee of Wine Companies* - www.ceev.be) is the representative body of the EU industry and trade in wines and wine products. Its membership gathers 24 national associations in Europe.

Our member enterprises produce and market the large majority of EU wines, and account for more than 90% of European wine exports worldwide.
The European Union (EU) is the main producer of wines and the leading worldwide exporter.

We understood that the Ministry of Food Processing, through the Grape Processing Board, is preparing a Code of Practices for Wine Grapes and Wine.
Our first interrogation is the status of this draft regulation, the link with Food and Safety Standards (Alcoholic Drink standards) and if it would be applicable for both domestic and imported products.

We fully welcome that, after that India joined the OIV last year, the OIV Code and Codex are taken as a major reference for the elaboration of this text. In our mind, it is the best solution in order to share a common legal framework for the production and trade in wines.

However, we want to take the opportunity to respectuously submit you some comments (in annex of this letter) on this draft Code and we hope that you could consider them positively.

Yours Sincerely,

José Ramón Fernandez
Secretary General

ceev
comité européen des entreprises vins
Vins, Vins Aromatisés, Vins Mousseux, Vins de Liqueur et autres Produits de la Vigne

ANNEX: Detailed comments on draft Code of Practices for Wine Grapes and Wine

1. Definitions

16. Wine

1.6.1. Basic definition
The basic definition laid down in point 1.6.1 is based on OIV one, which corresponds also to the EU general definition.
In the second paragraph a derogation to the minimum alcoholic strength (7% vol instead of 8% vol) is introduced to take into account specificities of certain vineyards.
A similar derogation exists in the EU legislation (point 1b of Annex XIter of Regulation 1234/2007) for wines with a Protected Designation of Origin (PDO) or a Protected Geographical Indication (PGI). But in this case the minimum alcoholic strength is 4,5% vol.
In order to avoid eventual trade disruption for these products, we request that the minimum alcoholic strength for specific wines could be 4,5% vol.

17. Special wines

1.7.1. Flor wines

This kind of products, elaborated in the EU, doesn't have the benefit of a specific definition in the EU. In addition, that definition, combined with the definition of liqueur wines, may introduce some confusion as some products may fulfill both definitions.

1.7.2. Liqueur wines

The content of definition 1.7.2 Liqueur wine seems to correspond to Spirituous wines (OIV 6/76) and not to Liqueur wines (OIV-ECO-2/2007).

In both OIV (resolution ECO-2/2007) and EU (point 3 of Annex XIter of R 1224/2007) definitions of liqueur wines, the minimum alcoholic strength is 15% vol.
And a maximum alcoholic strength is defined at 22% vol.
In order to avoid confusion and unfair competition, an alignment of the minimum and maximum alcoholic strength could be useful.
There is no, in OIV and EU definitions, reference to a minimum of alcohol originating from the endogenous sugar fermentation.

Avoiding such reference would allow that to cover all the products, including those with addition of ethyl alcohol from vitivinicultural origin with a unique definition (liqueur wines, syrupy wines and mistelles).

1.7.4. Sparkling wines
In EU legislation, the minimum pressure of carbon dioxide is 3 bars at 20°C.
The minimum of 3,5 bars applies only for the category "quality sparkling wines".

For the references to the sugar content, some other mentions exist in the EU rules for labeling (article 58 and Annex XIV part A of R 607/2009):

- "brut nature" if sugar content is less than 3g/l, only for products where no sugar is added after the second fermentation
- extra brut if sugar content is between 0 and 6 g/l

1.7.6. and 1.7.7.
These products are not defined at EU level.
Ice wine is only defined in Luxembourg and Austria as traditional terms.

1.8. Mistelles
Cf. definition of liqueur wines.

1.9.5. and 1.9.6 wine spirits and brandy/weinbrand

These definitions do not contain the maximum TAV of the distillates. According to European regulation (EC) n°110/2008, this point is the main difference between these 2 spirit drinks (EU definitions here-under).

Furthermore, according to European regulation (EC) n°110/2008, wine spirits can also be aged (EU definitions here-under). For example, "Cognac" is a Geographical Indication for a wine spirit produced in the Cognac delimited area, in respect of strict rules of production, such as a mandatory ageing of at least 2 years.

"4. Wine spirit
(a) Wine spirit is a spirit drink:
(i) produced exclusively by the distillation at less than 86 % vol. of wine or wine fortified for distillation or by the redistillation of a wine distillate at less than 86 % vol.,
(ii) containing a quantity of volatile substances equal to or exceeding 125 grams per hectolitre of 100 % vol.
alcohol,
(iii) having a maximum methanol content of 200 grams per hectolitre of 100 % vol. alcohol.
(b) The minimum alcoholic strength by volume of wine spirit shall be 37,5 %.
(c) No addition of alcohol as defined in Annex I(5), diluted or not, shall take place.
(d) Wine spirit shall not be flavoured. This shall not exclude traditional production methods.
(e) Wine spirit may only contain added caramel as a means to adapt colour.
(f) Where wine spirit has been matured, it may continue to be placed on the market as 'wine spirit' provided it has been matured for as long as, or longer than, the period stipulated for the spirit drink defined under category 5."

"5. Brandy or Weinbrand
(a) Brandy or Weinbrand is a spirit drink:
(i) produced from wine spirit, whether or not wine distillate has been added, distilled at less than 94,8 % vol., provided that that distillate does not exceed a maximum of 50 % of the alcoholic content of the finished product,
(ii) matured for at least one year in oak receptacles or for at least six months in oak casks with a capacity of
less than 1 000 litres,
(iii) containing a quantity of volatile substances equal to or exceeding 125 grams per hectolitre of 100 % vol.alcohol, and derived exclusively from the distillation or redistillation of the raw

materials used,
(iv) having a maximum methanol content of 200 grams per hectolitre of 100 % vol. alcohol.
(b) The minimum alcoholic strength by volume of brandy or Weinbrand shall be 36 %.
(c) No addition of alcohol as defined in Annex I(5), diluted or not, shall take place.
(d) Brandy or Weinbrand shall not be flavoured. This shall not exclude traditional production methods.
(e) Brandy or Weinbrand may only contain added caramel as a means to adapt colour."

3. Vinification

3.11
The OIV Code does not provide any assessment/indication about enrichment, independently of the process, although most producing countries allow it
In the EU rules for enrichment are laid down in Annex XXXX of R 1234/2007.
They allow:

- the addition of sugar, concentrated must (CM) and rectified concentrated grape must (RCM) for fresh grapes, grape must, grape must in fermentation, new wine still in fermentation
- the partial concentration for grape must (including reverse osmosis) and wine (cooling)

Conditions of use and limits are also defined in this Annex.

In order to avoid trade disruptions, enrichment processes have to be allowed.

Chemical standards

The limit for volatile acidity in OIV Code and EU (Annex IC of R 606/2009) is 1,2g/l (expressed in acetic acid, i.e. 20 milliequivalent/l)

EU texts of reference

- Regulation 1234/2007 for the general framework for wine and definitions of products
- Regulation (EC) 110/2008 on the definition, description, presentation, labelling and the protection of geographical indications of spirit drinks
- Regulation 606/2009 for oenological practices and applicable restrictions
- Regulation 607/2009 for labeling rules

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April 12, 2013

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From: James B. Clawson, JBC International

Subject: Proposed National Wine Standards

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Comments

GENERAL

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final status of these texts is intended to be. Some clarification of the anticipated evolution of these texts would be helpful.

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5. Express regulatory limits on a "per unit volume of wine" basis, rather than "per unit volume of alcohol" in the wine or any other basis.
6. Adopt a common way of expressing results where this is done in relation to a single wine constituent (e.g. for Total Acidity expressed in terms of one specific acid).
7. Consider the establishment of analytical "de minimis" values (or "action values") for substances or classes of substances in wine – i.e. values below which they will be deemed, to all intents and purposes, not to be present in the wine or not to require enforcement activity.
8. Allow suitable transition arrangements when limits are tightened, provided public health considerations so permit.
9. Conduct analyses of wine for compliance purposes in suitably accredited laboratories (or ensure they are overseen by appropriately certified analysts) that perform acceptably for the specific test methods used.
10. Use analytical methods for wine compliance purposes that are validated and/or have a demonstrably appropriate level of performance for wine.
11. Ensure that analyses for wine authenticity are conducted using methods for which the database of authentic sample results (with which test samples will be compared) is sufficiently comprehensive to avoid the mis-categorization of legitimate samples as fraudulent.
12. Ensure that Laboratories testing for compliance purposes supply measurement uncertainty information with their analytical results, and agree to take this information into account in interpreting analytical data.

SPECIFIC

Code of Practice Document

1) The note at the bottom of page 12 specifies that it is the 2012 version of the OIV International Code of Oenological Practices that should be used as the reference. In

practice, this text is updated by OIV annually, and the 2013 version is already available. Referring to a specific, dated version of the Code will mean that the document is rapidly outdated in relation to the developments in the winemaking world and specifically at OIV. Likewise, the definitions at the beginning of the document simply quote from the 2012 OIV Code verbatim, but if the OIV updates its definitions, the text will become outdated. The U.S. industry suggests that IGPB adopt the relevant sections of the OIV Code by reference, and/or to indicate those sections that it is not intended to adopt.

2) Section 2, the *Check list to be followed in case of quality of wine grapes, wine grape growers, drawing grape samples, wine grape varieties grown and standards to be followed for harvesting, etc.* is directed to Indian grape growers and should not apply to imports in any future regulatory standards. The country of import often has its own guidelines and/or standards for the quality of the grapes and wine.

3) Section 3, *vinification,* again should not apply in total to imported wine in any future regulatory requirement. The OIV International Code of Oenological Practices is not, and is not intended to be, a positive list of acceptable winemaking practices. Several practices it contains are listed as "not accepted" by OIV, and some common practices (e.g. enrichment and sweetening) are not addressed in the OIV Code. Thus if a practice is not mentioned in the OIV Code it simply means that the OIV has not considered it and reached a consensus on its acceptability – it does not mean that the practice is unacceptable. This section of the proposed Indian Standard seems to limit permitted practices only to those contained in the OIV Code.

   The list of winemaking practices in the proposed Code of Practice is not a complete list of those additives and processing aids used internationally in winemaking. Attached is a current list of those additives and processing aids used widely in other wine producing countries. As the IGPB work continues to develop standards, the U.S. industry requests that these other additives and processing aids be included. If this section as constituted is established as regulatory requirements it will prevent acceptable treatments that are used all over the winemaking world from being applied in India. Sections 3.10 and 3.11 are consistent with other international standards and are supported as standards by the U.S. industry.

Proposed Wine Standards Document

1) There is no legend associated with the list. We assume that "NA" in this text means there is no limit applied, i.e. "Not Applicable" rather than "Not Allowed". However, some clarification will be appreciated.

2) For the limit on sodium in excess, see below for argumentation as to why this limit is not relevant for today's winemakers.

Wine Standards Justification Document

1) The U.S. industry notes that the limit for "sodium in excess" is justified on the basis of the salinity of the soils in India. It is important to note, though, that this limit was not established by the OIV to regulate the level of sodium in wine. Rather, "sodium in excess" refers to the quantity of sodium cations in the wine that cannot be paired off, one-for-one, with chloride anions (thus, saline soils shouldn't have an impact on the quantity of "sodium in excess"). This limit was originally designed to prevent the addition to wine of substances such as sodium hydroxide in order to adjust the pH upwards. The limit is not much used in the present day and age, but this background may suggest (if India still wants to adopt the limit) that there is little need to deviate from the value in the OIV text.

2) The document establishes a limit for "methanol" in sparkling wine, different than the limits for red or white wines, and without explanation in the footnote text. This does not seem to derive from an OIV value. Is there a justification?

3) The limit for "volatile acidity" limit of 1 g/L is lower compared with limits set in other parts of the world. For example, in the U.S., the limit for each type of wine is: Red: 1.40 g/L and White: 1.20 g/L (expressed as acetic acid), whereas a limit of 1.5 g/L is not uncommon in other wine producing countries. The limit in the proposed standard is one of the lowest that exists anywhere in the world and this may lead to difficulties in production but also in trade if this becomes a regulation and is applied to imported wines.

Conclusion

The U.S. industry applauds this initiative and is prepared to continue to work with the IGPB as it further develops these standards. As the Indian winegrape growing and wine production continues to increase Indian wine will gain in international prominence. The U.S. industry welcomes these developments and encourages the Indian industry and the IGBP on its behalf to adopt international best practices for producing their wine.

Thank you for the opportunity to submit these comments.

NEW ZEALAND WINE

PURE DISCOVERY

RESPONSE TO INDIA'S PROPOSED NATIONAL WINE STANDARDS

APRIL 2013

1 Introduction

1.1 New Zealand Winegrowers (**NZW**) is the organisation that provides strategic leadership for, and researches, promotes and represents the interests of, New Zealand grape growers and wine makers. Established in 2002 as a joint venture between the New Zealand Grape Growers Council and Wine Institute of New Zealand, NZW now has approximately 700 winery and over 800 independent grape grower members. Indeed, every grape grower and wine maker in New Zealand is a member of NZW. Accordingly, NZW is recognised as New Zealand's principal wine industry organisation.

1.2 NZW welcomes the opportunity to comment on the Indian Grape Processing Board's (**IGPB**) proposed National Wine Standards (**Standards**) and Code of Practice. Both documents provide a degree of clarity both for Indian winemakers, and for winemakers hoping to export their product to India.

1.3 NZW has a number of suggestions in relation to both the Standards and Code of Practice, which we would be happy to discuss with the IGPB in further detail, particularly if the Standards are to inform the development of wine regulations in due course.

2 Proposed Wine Standards and Standards Justification

2.1 The Proposed Wine Standards establish limits for the presence of certain additives and processing aids used internationally in winemaking. While these limits provide transparency and certainty, in some cases they are more stringent than is necessary, or indeed *un*necessary, from a food safety perspective; and/or differ

from internationally accepted winemaking practices. As a member of the World Wine Trade Group, New Zealand supports and adheres to the Group's *Regulatory Principles*, which, among other things, seek to avoid unnecessary limits and encourage regulatory consistency across the Group's members to the greatest extent possible in order to facilitate international trade.

2.2 Where there is a low risk of a particular substance being present in wine, and/or a low food safety risk associated with its presence, good regulatory practice would suggest that there is no real rationale to regulate for the presence and/or limits of such substances. To this end, New Zealand regulators have not specified limits for the presence of arsenic, cadmium, lead, or zinc. Winemakers are instead encouraged to follow good manufacturing practice so as to ensure that the presence of these substances is "as low as is reasonably achievable".

2.3 New Zealand has no stated limit for volatile acidity. This is a quality, rather than food safety, issue, and consequently is not subject to government regulation. Nevertheless, excess volatile acidity can be a factor that causes a wine to become ineligible for export.

2.4 If a limit for volatile acidity is deemed necessary, the limits established by the OIV generally represent the lowest reasonable level that should be adopted for standard table wines with a total alcohol level of 13% or less. A more permissive approach is required for wines with elevated sugar or alcohol levels, in respect of which volatile acidity can legitimately reach higher levels.

2.5 We note that the IGPB's Standards does not include a number of other additives and processing aids commonly used to make wine. We would encourage the IGPB to extend its list of additives and processing aids to reflect current accepted international winemaking practices and would be happy to provide a comprehensive list in this regard. In addition, the limit for a number of additives and processing aids is noted as "NA". We assume this is an abbreviation for "Not Applicable" but would be grateful for the IGPB's confirmation that this is the case.

3 Code of Practice

3.1 NZW supports the Code of Practice's cross-referencing of the OIV's International Code of Oenological Practices (OIV Code) and *Codex Alimentarius's* General Standard for Food Additives as a basis for establishing India's winemaking standard. Cross-referencing internationally recommended standards facilitates the development of consistent winemaking practices across importing and exporting countries. However, we suggest that:

3.1.1 while the OIV Code provides internationally recognised guidelines that can inform domestic regulatory frameworks, the OIV Code should not be construed as an exclusive code encompassing all winemaking practices. Rather, the OIV Code encompasses those practices in respect of which the OIV has developed a position following specific consideration of a particular practice. Certain practices which the OIV has not yet considered are not addressed in the OIV Code (including enrichment and sweetening), but this does not mean that those practices are not internationally accepted;

3.1.2 the Code of Practice cross-reference to the relevant section of the OIV Code rather than the year of issue, so as to preserve the relevancy of the IGPB's Code of Practice in the event the OIV Code is updated; and

3.1.3 the IGPB should clarify that the Code of Practice applies to Indian grape growers, not to imports, since other winemaking countries will usually have their own guidelines and/or standards for the quality of grapes and wine.

4 Closing comment

4.1 NZW commends the IGPB's efforts to develop domestic guidelines for grape growing and limits for the presence of certain processing aids and additives and to invite observations, comments and suggestions in respect of these. Such guidelines help ensure that domestic production meets minimum quality and food safety levels.

4.2 While the proposed guidelines are more stringent, and in some cases, unnecessary to address either quality or food safety concerns (or both), NZW appreciates the opportunity to provide comment and make suggestions in this regard. In seeking the views of a wide range of stakeholders, NZW is confident the IGPB's proposed Standards and Code of Practice will be enhanced as a result.

4.3 NZW is grateful for the opportunity to submit these comments and would be pleased to provide further input or assistance to the IGPB if requested.

Australian Government
Department of Agriculture, Fisheries and Forestry

Mr Randhir Patel
Under Secretary,
Ministry of Food Processing Industries, Government of India

Dear Mr Patel

Thank you for the opportunity to provide comments on the new wine standards proposed by the Indian Grape Processing Board.

The following comments have been prepared by the Australian Government Department of Agriculture, Fisheries and Forestry in conjunction with the Wine Australia Corporation and industry peak body; the Winemakers' Federation of Australia.

Australia welcomes the efforts the Indian Government has made in developing the code of practice and National Wine Standards, understanding that the proposed standards are intended to apply only to wine produced in India.

Australia would appreciate clarification on whether the Code of Practice and Wine Standards are intended to also apply to wine imported into India from other countries.

Comments for consideration by the Indian Grape Processing Board are provided below:

Indian Codes of Practices

1. Australia supports the development of the proposed standard and is interested to know if the standards will be put into regulation.

2. Australia welcomes the reference to the OIV International Code of Oenological Practices.

3. The note at the bottom of page 12 of the Code of Practices identifies the 2012 issue of the OIV International Code of Oenological Practices as the reference. The OIV update this text annually, and the 2013 version is already available, which may result in the proposed document becoming quickly outdated in relation to the developments in the winemaking world and specifically at OIV.
   The definitions at the beginning of the document also quote directly from the 2012 OIV code, which may also pose a risk for the document to become outdated if the OIV updates its definitions.

   Australia suggests that the Indian Standard instead adopt the relevant sections of the OIV Code by reference and/or indicate any sections that are not intended to be adopted, to prevent the document from becoming quickly outdated.

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Proposed Wine Standards

4. The use of "NA" in the proposed standards document needs some clarification. It is expected that in this context it refers to "Not Applicable," rather than "Not Allowed." However, either interpretation poses some questions of the standard's meaning.

    - If NA means "Not Applicable," and therefore there is no standard to limit the presence of a particular product, this could pose a risk to human health.
    - If NA means "Not Allowed, " this is likely to pose an issue for many commonly used additives such as ascorbic acids, citric acid, lysozyme, metatartaric acid, PVPP, sorbic acid, tannin, DMDC.

    Australia recommends that clearer instructions be provided on the use of 'NA' to eliminate the potential for misinterpretation.

5. Australia notes that the limit for sodium in excess is justified on the basis of the salinity of Indian soils. However, it is important to note that this limit was not established by the OIV to regulate the level of sodium in wine. Rather, "sodium in excess" refers to the quantity of sodium cations in the wine that cannot be paired off, one-for-one, with chloride anions (i.e. saline soils should not impact the quantity of "sodium in excess"). This limit was originally designed to prevent the addition of substances such as sodium hydroxide in order to adjust the pH upwards. The limit is not frequently used anymore, but this background may suggest that there is little need to deviate from the value in the OIV text.

    Australia recommends that the limit be as for the OIV.

6. The limit for Volatile acidity at 1 g/L (expressed as acetic acid) is a quality parameter. The current proposed standard may limit the variety of wines that are acceptable.

    Australia suggests a level of 1.5g/L to permit a wider variety of wines to be acceptable.

Thank you again for considering these comments.

Yours sincerely

Peter Ottesen

Mr Peter Ottesen
Assistant Secretary
Crops, Horticulture and Wine

12 April 2013